



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MAY 18 2018

Lawrence H. Norton, Esq.  
Venable LLP  
575 7th Street, NW  
Washington, DC 20004

RE: MURs 7014/7017/7090  
Vivek Garipalli  
DE First Holdings

Dear Mr. Norton:

On February 19, 2016, February 24, 2016, and June 23, 2016, the Federal Election Commission notified your client, DE First Holdings, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. After the complaints were filed, your client, Vivek Garipalli, joined as a respondent. On May 10, 2018, the Commission considered the complaint but was equally divided on whether to find reason to believe that DE First Holdings and Mr. Garipalli violated 52 U.S.C. § 30122. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016), effective September 1, 2016. A Statement of Reasons explaining the Commission's decision will follow.

If you have any questions, please contact Claudio J. Pavia, the attorney assigned to this matter, at [cpavia@fec.gov](mailto:cpavia@fec.gov) or (202) 694-1597.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Shonkwiler", with a long horizontal line extending to the right.

Mark Shonkwiler  
Assistant General Counsel

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